

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

<div>In re: THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, as representative of THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i> Debtors.¹</div>	<div>PROMESA Title III Case No. 17-BK-3283-LTS Re: ECF Nos. 14277, 14298 (Jointly Administered)</div>
<div>In re: THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO as representative of PUERTO RICO ELECTRIC POWER AUTHORITY, Debtor.</div>	<div>PROMESA Title III Case No. 17-BK-4780-LTS This filing relates only to PREPA and shall only be filed in the lead Case No. 17-3283 and Case No. 17-BK-4780-LTS</div>

CONSENTED MOTION FOR EXTENSION OF DEADLINES

To the Honorable United States District Court Judge Laura Taylor Swain:

The Puerto Rico Electric Power Authority (“PREPA”) respectfully submits this urgent consented motion for entry of an order, substantially in the form attached hereto as **Exhibit A** (the

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

“Proposed Order”), extending the deadlines set forth in the *Order Scheduling Briefing of Motion for Relief From the Automatic Stay* [ECF No. 14277] (the “Scheduling Order”).²

Request for Relief

1. On September 14, 2020, Maria Colón Crispin (“Movant”), filed the Motion for Relief From the Automatic Stay [ECF No. 14277] (the “Motion”), requesting that the Court enter an order declaring that the stay is not applicable to the case captioned *María Colón Crispin v. Municipio de Carolina, et al.*, Civil Case No. CA2018CV00323, in the Puerto Rico Court of First Instance of Carolina (“Prepetition Action”) or for the Court to lift the stay and order the Prepetition Action to continue. *See* Motion at 9.

2. On September 15, 2020, the Court entered the Scheduling Order, which provides that oppositions to the Motion must be filed by September 28, 2020.

3. PREPA is in the process of reviewing additional information related to the Prepetition Action and the relief requested in the Motion and needs additional time to complete the review and also, meet and confer with Movant. PREPA, with the consent of Movant’s counsel, proposes the following extensions of the deadlines set forth in the Scheduling Order:

- The deadline to file opposition papers shall be extended to **October 5, 2020**.
- The deadline for Movant to file a reply to an opposition, if any, shall be extended to **October 12, 2020**.

6. PREPA discussed this request with counsel for Movant, who consented to the relief requested herein.

² The Financial Oversight and Management Board for Puerto Rico, as PREPA’s representative pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”), has authorized PREPA to file this Motion.

7. Pursuant to Paragraph I.H of the *Thirteenth Amended Notice, Case Management and Administrative Procedures* [ECF No. 13512-1], PREPA hereby certifies that it has carefully examined the matter and concluded that there is a true need for an urgent motion; it has not created the urgency through any lack of due diligence; has made a bona fide effort to resolve the matter without a hearing; has made reasonable, good-faith communications in an effort to resolve or narrow the issues that are being brought to the Court, and no party opposes the relief requested herein.

WHEREFORE, PREPA requests the Court enter the Proposed Order and grant such other relief as is just and proper.

Respectfully submitted,

In San Juan, Puerto Rico, this 24th day of September 2020.

DÍAZ & VÁZQUEZ LAW FIRM, P.S.C

/s/ Katiuska Bolaños

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Counsel for Puerto Rico Electric Power Authority

Exhibit A

Proposed Order

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

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**ORDER GRANTING CONSENTED MOTION
FOR EXTENSION OF DEADLINES**

Upon consideration of the *Urgent Consented Motion for Extension of Deadlines* (the “Extension Motion”);² and the Court having found it has subject matter jurisdiction over this matter pursuant to PROMESA section 306; and it appearing that venue in this district is proper

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² Capitalized terms used but not otherwise defined herein have the meanings given to them in the Extension Motion.

pursuant to PROMESA section 307; and the Court having found that the relief requested in the Extension Motion is in the best interests of PREPA and Movant; and the Court having found that PREPA provided adequate and appropriate notice of the Extension Motion under the circumstances and that no other or further notice is required; and the Court having reviewed the Extension Motion; and the Court having determined that the factual bases set forth in the Extension Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is **HEREBY ORDERED THAT:**

1. The Extension Motion is granted as set forth herein.
2. The deadline to file opposition papers shall be extended to **October 5, 2020**.
3. The deadline for Movant to file a reply to an opposition, if any, shall be extended to **October 12, 2020**.

Dated: September __, 2020

HONORABLE LAURA TAYLOR SWAIN
UNITED STATES DISTRICT JUDGE